

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PATRICIA RODRIQUEZ,	)	
	)	
Plaintiff,	)	NO. 08 C 2095
	)	
v.	)	HON. JUDGE LEINENWEBER
	)	Judge Presiding
CITY OF CHICAGO, CHICAGO POLICE	)	
OFFICERS M. MALDONADO, N. BARRY,	)	MAGISTRATE JUDGE NOLAN
C. TRAYNOR, UNKNOWN CHICAGO POLICE	)	
OFFICERS, G-A RESTAURANT, LLC,	)	
(d/b/a; "Manor/Stay") COLIN COMER, and	)	
UNKNOWN G-A RESTAURANT EMPLOYEES	)	
	)	
Defendants.	)	

**DEFENDANT OFFICERS AGREED MOTION  
FOR ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants, Michelle MALDONADO, Christopher TRAYNOR, and Nora BARRY, ("Defendant Officers"), by one of their attorneys, Thomas H. Freitag, Assistant Corporation Counsel of the City of Chicago, respectfully request this Honorable Court pursuant to FRCP 6(b)(1), to enlarge Defendant Officers respective times to answer or otherwise plead to Plaintiff's Complaint in this matter thirty (30) days from today's date, up to and including July 18th, 2008. In support, Defendants state:

1. Plaintiff filed a complaint against the Defendants on or about April 12, 2008.
2. The complaint was served upon Christopher Traynor and Nora Barry on May 7, 2008, and upon Michelle Maldonado on May 12, 2008. The Defendant Officers answers were due on May 27, 2008, and June 2, 2008, respectively.
3. Due to administrative delays, the case was not assigned to present counsel for the Defendant Officers until June 10, 2008. Counsel has not yet met with his clients in order to prepare an answer, and therefore requests an additional thirty days to answer. Answering on

behalf of all Defendant Officers at the same time will provide uniform briefing schedules as well as improved efficiencies for the Court.

5. I discussed this matter with Plaintiff's counsel Mr. Jared Kosoglad by telephone yesterday, and, under the circumstances, stated he had no objection to this motion.

6. Plaintiff has not been prejudiced by the delay in responding to her Complaint since the time service was had, and will not be prejudiced by the granting of this motion.

7. This motion is filed in good faith, and is not intended for the purpose of undue delay.

WHEREFORE, the Defendant Officers respectfully request that this Court grant their motion for an enlargement of time to answer the complaint or otherwise plead, to July 18, 2008.

Respectfully submitted,

MICHELLE MALDONADO, CHRISTOPHER  
TRAYNOR, and NORA BARRY,

By one of their attorneys,

30 North LaSalle Street, Suite 1400  
Chicago, Illinois 60602  
(312) 742-7391  
Atty. No. 6272245

/s/ Thomas H. Freitag  
Thomas H. Freitag  
Assistant Corporation Counsel